

## REMARKS/ARGUMENTS

Reconsideration of this application is requested.

The Examiner is advised that the subject matter of the various claims pending in this application was commonly owned at the time any inventions covered therein were made.

### *Rejections – 35 U.S.C. § 103(a)*

The Office Action rejects claims 3-9, 11-14, 16 and 18-20 under 35 U.S.C. 103(a) as being unpatentable over Bach in view of Pick et al. and Summers. Applicants respectfully disagree.

Bach discloses an ultraviolet sterilization unit having a housing attached to an air heating and cooling system. The housing includes two apertures into which lamp cartridges are inserted. The lamp cartridges carry ultraviolet lamps operating in a frequency capable of sterilizing air within the system. The cartridges are configured to automatically de-energize the lamps when the lamp cartridge is removed from the housing. When the sterilization unit is a multiple lamp system, when one of the lamp cartridges is removed all lamps are de-energized. The de-energizing of the lamps occurs before a user will view the lamp.

In one embodiment shown in Figure 10, a connector 82 supplies electric current to an end of a double-ended infrared lamp 84. External wires 80 and connector 82 are provided to the far end of the lamp 84 to connect to prongs 86, thereby providing a complete circuit (column 7, lines 61-64). Bach does not teach or suggest a frame for supporting a radiation source and means for focusing

radiation emitted by the radiation source, the frame being configured to be mountable at only one end thereof, as asserted in the Office Action.

It is established law that in order to render a claimed invention obvious, the cited references must, in combination, teach or suggest the claimed structure. It is clear that, on any fair interpretation of the cited references, the claimed structure is neither taught nor suggested by any combination of Bach, Pick et al. and Summers.

Bach fails to teach or suggest a frame for supporting a radiation source or means for focusing radiation emitted by the radiation source, the frame being configured to be mountable at only one end thereof. Pick et al. and Summers teach independent mounts connected at opposing points on a cabinet or air handling structure for supporting means for focusing radiation emitted by the radiation source. The means for focusing in accordance with Pick et al is fixedly mounted in various ways (Figs. 1, 8 and 12). The means for focusing in accordance with Summers is oscillated about pivots supported by opposed, independent brackets 46 (Fig. 4).

As noted above, Bach teaches a lamp supported from only one end. Bach fails to teach or suggest any kind of a frame for supporting a radiation source and means for focusing radiation emitted by the radiation source, the frame being configured to be mountable at only one end thereof. It is therefore respectfully submitted that in combination the cited references fail to teach or suggest the invention claimed in claim 3, and the rejection of claim 3 is traversed.

With respect to claims 4-9, which depend from claim 3, the same arguments apply and the rejection of claims 4-9 is traversed.

Respecting claim 11, as noted above and explained in detail, no combination of Pick et al., Summers or Bach teaches or suggests an elongated frame and a housing secured to one end of the frame with a reflector for focusing the ultraviolet radiation emitted by the source, the reflector being rotatably mounted to the frame. As would be understood by any person skilled in the art, the connector 82 and external wires 80 taught by Bach could not support the reflector and do not provide or suggest the structure of a frame. As is likewise understood by those skilled in the art, the ultraviolet lamp is not adapted to support a reflector that is oscillated about the lamp.

In addition, the plug structure 37/60 taught by Bach fails to provide the locking function claimed in claim 11 in order to securely support (the weight of the elongated frame, the ultraviolet lamp and the reflector, etc.) regardless of an orientation of the quick-install irradiation unit.

It is therefore respectfully submitted that the rejection of claim 11 is likewise unfounded and the rejection is traversed.

Claims 12-14 depend from claim 11 and the rejection of those claims is likewise traversed for the same reasons.

With respect to the method claimed in claim 16, the same arguments apply as set forth above with respect to claims 1 and 11 and the rejection of claims 16 and 18-19 is traversed.

The Office Action rejected claim 17 under 35 U.S.C. 103(a) as being unpatentable over Bach, Pick et al., Summers and Couch.

Couch constitutes non-analogous art that teaches a two-member bracket assembly, each member cooperating with the other. A locking effect is produced on an article, such as a screw or bolt, securely mounted in a wall or the like. In an embodiment shown in Figs. 8 and 9, a slot is provided in a clip-like element 222 which is pivotally mounted along on side edge at 240 to the interior wall of a bight 223 forming part of a member 221. The clip-like element 222 is not disengageable from the sliding engagement with its member 221. Slot 235 aligns with aperture 226 in bight 223 of member 221 upon pivotal movement with the element 222 across the interior wall of the bight 223. Its pivotal movement is biased across aperture 226 by means 242, such as a coiled spring 242 operatively connected between the clip-like element 222 and a member 221.


Exactly how Couch would lead a person of ordinary skill in the art to the invention claimed in claim 17 is unclear. The only feature that non-analogous Couch has in common with the invention claimed in claim 17 is a pivotally mounted latch member. Otherwise, the cited structure bears no resemblance to the claimed lock mechanism. In any event, as explained above in detail, no combination of Pick et al., Summers and Bach would lead a person of ordinary skill in the art to the invention claimed in claim 16. The rejection of claim 17 is thereby traversed.

For reasons set forth above in detail, claims 3-9, 11-14 and 16-20 pending in this application are considered to be in a condition for immediate

allowance. If for any reason the Examiner does not concur, the Examiner is requested to contact the undersigned attorney for the Applicants by telephone. For reasons set forth above this application is considered to be in a condition for allowance. Early issuance of a Notice of Allowance is therefore requested.

If there are any fees required in connection with this communication, please charge the same to Deposit Account No. 16-0820, Order No. 33277.

Respectfully submitted,

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